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 SPORTS SHINKO CO., LTD.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD., a Japanese corporation,) CIVIL NO. CV 04-00124
) ACK/BMK
Plaintiff,) CONSOLIDATED CASES
vs.)
QK HOTEL, LLC, a Hawai'i limited liability company, KG HOLDINGS, LLC, a Hawai'i limited liability company, FRANKLIN K. MUKAI,) PLAINTIFF SPORTS SHINKO CO., LTD.'S ANSWERS TO DEFENDANT FRANKLIN K. MUKAI'S FIRST REQUEST FOR ANSWERS TO INTERROGATORIES TO PLAINTIFF (IN CIVIL NO. CV 04-00124 ACK/BMK), DATED OCTOBER 19, 2006
Defendants,)

Hawai`i corporation, and)
OCEAN RESORT HOTEL)
CORPORATION, a Hawai`i)
corporation,)
)
Third-Party)
Defendants.)
)

**PLAINTIFF SPORTS SHINKO CO., LTD.'S ANSWERS TO
DEFENDANT FRANKLIN K. MUKAI'S FIRST REQUEST FOR
ANSWERS TO INTERROGATORIES TO PLAINTIFF (IN CIVIL
NO. CV04-00124 ACK/BMK), DATED OCTOBER 19, 2006**

Plaintiff Sports Shinko Co., Ltd. ("SS Japan"), hereby responds and objects to Defendant FRANKLIN K. MUKAI's ("Mukai") First Request for Answers to Interrogatories dated October 19, 2006 as follows:

GENERAL OBJECTIONS

1. SS Japan objects to the Interrogatories to the extent they seek information protected by the attorney-client privilege, the work product doctrine and any other applicable privilege, and no such information will be provided. By responding to the Interrogatories, SS Japan does not waive, intentionally or otherwise, its attorney-client privilege, work product doctrine protection, or any other privilege or doctrine protecting its

(b) See answers above.

(c) See answers above.

(d) See answers above.

5. *As to SS Japan's alleged status of a creditor of SS Waikiki, state, as of the date of the Purchase and Sale Agreement:*

(a) *The amount of SS Waikiki's indebtedness.*

(b) *Identify any document, including, but not limited to, all promissory notes which evidence, directly or indirectly, the indebtedness.*

(c) *Describe all changes in the inter-company accounts with respect to any such debts from the date of the Purchase and Sale Agreement to present.*

Objection: Unduly burdensome and seeks attorney work product. Plaintiff SS Japan is not required to provide its complete analysis or list of all facts relevant to this issue to Defendant Mukai, who is in possession of, and may just as easily ascertain the answers for himself from his own documents and knowledge. Answer is subject to ongoing discovery. Without waiving these objections, Plaintiff SS Japan responds as follows:

ANSWER:

(a) Plaintiff has already produced, or will produce, non-privileged documents in response to this interrogatory. See attached chart of Bates Numbers of certain responsive documents. Plaintiff has no obligation to provide, and will not provide, an exhaustive list.

(b) Same as above.

(c) Same as above.

6. *State all facts upon which you rely to support your allegation that SS Waikiki was insolvent on the date the Purchase and Sale Agreement was executed.*

Objection: Unduly burdensome and seeks attorney work product. Plaintiff SS Japan is not required to provide its complete analysis or list of all facts relevant to this issue to Defendant Mukai, who is in possession of, and may just as easily ascertain the answers for himself from his own documents and knowledge. Answer is subject to ongoing discovery. Without waiving these objections, Plaintiff SS Japan responds as follows:

ANSWER:

See answer to Interrogatory No. 5.

7. *If you contend that SS Waikiki was insolvent as of January 15, 2002, state when SS Waikiki first became insolvent and provide the dates of any periods thereafter in which you contend that SS Waikiki was solvent.*

Objection: Unduly burdensome and seeks attorney work product. Plaintiff SS Japan is not required to provide its complete analysis or list of all facts relevant to this issue to Defendant Mukai, who is in possession of, and may just as easily ascertain the answers for himself from his own documents and knowledge. Answer is subject to ongoing discovery. Without waiving these objections, Plaintiff SS Japan responds as follows:

ANSWER:

See answer to Interrogatory No. 5.

8. *Identify all documents of which you are aware which support, either directly or indirectly, your allegation that SS Waikiki was insolvent at the time of the Sales Transaction.*

Objection: Unduly burdensome and seeks attorney work product. Plaintiff SS Japan is not required to provide its complete analysis or list of all facts relevant to this issue to Defendant Mukai, who is in possession of, and may just as easily ascertain the answers for himself from his own documents and knowledge. Answer is subject to ongoing discovery. Without waiving these objections, Plaintiff SS Japan responds as follows:

ANSWER:

See answer to Interrogatory No. 5.

9. *State the name(s) and address(es) of each member of the Board of Directors and each shareholder of the company which acquired the stock of SS Japan from the Trustee and/or Deputy Trustees appointed by the District Court for Osaka, Japan in the bankruptcy proceedings referred to in paragraphs 46 and 48 of the Second Amended Complaint.*

Objection: Vague and ambiguous, overly broad, unduly burdensome, misstates facts, harassing, seeks information protected by Japan's privacy laws, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Plaintiff SS Japan answers as follows:

ANSWER:

See Plaintiffs Sports Shinko Co., Ltd.'s and Sports Shinko (USA) Co., Ltd.'s Supplemental and Amended Answers to KG Interrogatories dated December 21, 2005. See also documents and information produced to the KG Defendants under the Stipulated Protective Order regarding South Wind Realty Finance (Cayman) Company ("SW"), including financials, tax returns, and corporate registry.

10. *State the manner in which the loans referred to in paragraphs 7 and 12 of the Second Amended Complaint were treated in the financial statements of the acquiring company, and in the financial statements of the company whose stock was acquired as a result of the stock acquisition referenced in the preceding interrogatory.*

Objection: Unduly burdensome, harassing, unintelligibly vague and ambiguous. Seeks opinion testimony and legal conclusions and confidential financial information of a non-party. The request seeks information that is irrelevant to any claim or defense and is not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff SS Japan is not required to provide its complete analysis and compilation of all the facts and documents. Seeks information not within the control of Plaintiff SS Japan. Seeks information already produced in response to informal discovery requests subject to the Stipulated Protective Order. Without waiving these objections, Plaintiff SS Japan responds as follows:

ANSWER:

See answer to Interrogatory Nos. 5 and 9 and the referenced financial statements.

VERIFICATION

JAPAN)
) SS:
 TOKYO)

MICHIIRO CHIKUBU, being first duly sworn on
oath, deposes and says:

That he is the President of SPORTS SHINKO CO., LTD.
and that he is an agent of SPORTS SHINKO CO., LTD. for the
purpose of answering the foregoing *requests for answers to*
interrogatories and for making this verification, and the foregoing
answers are true according to his knowledge, information, and
belief.

SPORTS SHINKO CO., LTD.

By *M. Ch*
Its *MICHIIRO CHIKUBU President*

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
Exh. K-C		1	Exhibit K-C to Plaintiffs' MIO to KG's Motion for Summary Judgement
232 0527	232 0531	2	
232 0731	232 0738	2	
		2	Oral Deposition: Satoshi Kinoshita Taken 8/1/02 in Resnick vs. SSK litigation
		2	Oral Deposition: Satoshi Kinoshita Taken 4/19/05 - 4/21/05 in SS vs. RMS litigation 02-1-2766-11 litigation
001 1581	001 1585	4	
Exh. 20 to MIO		4	Exhibit 20 to Plaintiffs' MIO to KG's Motion for Summary
259 0001	259 0257	4	
001 0883	001 0920	5	
001 0921	001 0924	5	
001 1818	001 1851	5	
003 0709	003 0716	5	
004 1173	004 1174	5	
004 1180	004 1181	5	
013 1583	013 1584	5	
014 0021	014 0022	5	
014 0023	014 0028	5	
014 0058	014 0061	5	
014 0191	014 0198	5	
014 0758	014 0761	5	
014 0869	014 0871	5	
014 1043	014 1044	5	
014 1472	014 1473	5	
014 1628	014 1629	5	
015 0879	015 0881	5	
015 1035		5	
022 0046	022 0047	5	
022 0114	022 0119	5	
022 0506	022 0520	5	
022 0521	022 0522	5	
022 0995	022 1002	5	
022 1003	022 1006	5	
023-1(a)		5	7/16/96 Fax fm T. Fukuda to F. Mukai, Esq. re Pukalani STP
023-1(b)		5	9/19/96 Fax fm T. Fukuda to S. Tomita (cc: S. Kinoshita, E. Kawatani, Esq.) re QKH/BOH Loan
026-2(a)		5	11/28/90 Fax memo fm T. Fukuda to H. Hanada (cc: F. Mukai) re capital stock of SSH
027 1001	027 1010	5	
028 1063	028 1066	5	
033 0192	033 0199	5	
033 0230	033 0249	5	
053-1(a)		5	1/1/90 Draft: Agreement Between Sports Shinko Co., Ltd. and SSH
053-4(a)		5	5/29/90 Memo from F. Fukuda to F. Mukai re payment of
068 0961	068 0986	5	
069 1043	069 1047	5	
069 1048	069 1050	5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
069 1051	069 1052	5	
069 1053	069 1055	5	
069 1056R	069 1058	5	
086 1105	086 1114	5	
088 1114	088 1115	5	
088 1116		5	
088 1145		5	
088 1168		5	
088 2023		5	
089 0037	089 0042	5	
089 0043		5	
089 0044		5	
089 0045		5	
089 1164		5	
089 1165	089 1170	5	
089 1167	089 1169	5	
089 1330	089 1333	5	
089 1479	089 1480	5	
089 1505;	089 1539	5	
089 1566		5	
089 1583		5	
089 1607	089 1622	5	
089 1632	089 1634	5	
089 1948		5	
089 1953		5	
089 1957		5	
089 1958		5	
089 1979		5	
089 2458	089 2476	5	
090 0389;	090 0401	5	
090 0002	090 0027	5	
090 0028	090 0045	5	
090 0029;	090 0042	5	
090 0046	090 0061	5	
090 0047;	090 0057	5	
090 0062	090 0095	5	
090 0063;	090 0093	5	
090 0096	090 0126	5	
090 0127	090 0160	5	
090 0128;	090 0158	5	
090 0267	090 0292	5	
090 0268;	090 0273	5	
090 0277	090 0280	5	
090 0286	090 0287	5	
090 0293	090 0311	5	
090 0294;	090 0307	5	
090 0312	090 0330	5	
090 0313;	090 0325	5	
090 0331	090 0349	5	
090 0332;	090 0346	5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
090 0350	090 0368	5	
090 0351;	090 0365	5	
090 0369	090 0387	5	
090 0370	090 0383	5	
090 0388	090 0405	5	
090 0406	090 0421	5	
090 0407	090 0417	5	
090 0422	090 0437	5	
090 0423	090 0436	5	
090 290		5	
091 1972	091 1973	5	
091 1975	091 1977	5	
091 1992		5	
091 2020	091 2023	5	
091 2024	091 2026	5	
091 2027	091 2029	5	
091 2040	091 2044	5	
091 2095		5	
091 2096		5	
091 2191	091 2192	5	
091 2454	091 2458	5	
092 0550		5	
093 0008	093 0012	5	
093 0086	093 0088	5	
093 0713		5	
093 1809		5	
093 1953	093 1958	5	
094 0399	094 0401	5	
094 0759;	094 0788	5	
094 2703	094 2704	5	
095 0007	095 0009	5	
095 1548	095 1656	5	
095 1666	095 1783	5	
096 2067		5	
096 2069		5	
096 2070		5	
096 2071	096 2075	5	
096 2076	096 2079	5	
096 2104		5	
096 2105		5	
096 2138		5	
096 2157	096 2158	5	
096 3093		5	
096 3094	096 3095	5	
096 3096	096 3097	5	
096 3110;	096 3122	5	
096 3123		5	
096 3127;	096 3134	5	
096 3135		5	
096 3155;	096 3164	5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
097 0049	097 0051	5	
097 0418	097 0421	5	
097 0481	097 0492	5	
097 0675	097 0680	5	
097 0732	097 0737	5	
097 1008	097 1009	5	
100 0394	100 0395	5	
100 0427	100 0443	5	
100 0509	100 0526	5	
100 0611	100 0615	5	
100 0686	100 0697	5	
100 0755		5	
100 0756	100 0758	5	
100 0757	100 0758	5	
100 0764	100 0766	5	
100 0823	100 0824	5	
100 0826	100 0831	5	
100 0976	100 0990	5	
101 0126	101 0130	5	
101 0815		5	
101 0815		5	
103 1003	103 1006	5	
103 1248	103 1251	5	
103 1533;	103 1539	5	
103 1537		5	
103 1926	103 1929	5	
103 2075	103 2077	5	
103 2126		5	
103 2135	103 2137	5	
103 2154	103 2156	5	
103 2173	103 2174	5	
103 2175	103 2176	5	
103 2178	103 2180	5	
103 2188	103 2189	5	
103 2209		5	
103 2214		5	
103 2217	103 2219	5	
103 2220	103 2224	5	
103 2226	103 2228	5	
103 2283		5	
103 2285		5	
103 2286		5	
103 2290		5	
103 2301		5	
103 2302		5	
103 2308	103 2313	5	
103 2621	103 2624	5	
103 3375	103 3376	5	
103 3379		5	
103 3380		5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
103 3380;	103 3398	5	
103 3381	103 3384	5	
103 3392		5	
103 3396		5	
104 0550	104 0565	5	
104 0571		5	
104 0582		5	
104 2393	104 2394	5	
104 2395	104 2396	5	
104 2429;	104 2447	5	
104 2473	104 2474	5	
104 2475	104 2476	5	
105 0019;	105 0039	5	
105 0519;	105 0613	5	
106 0550		5	
107 0594;	107 0600	5	
107 0600		5	
107 2055;	107 2058	5	
108 1530		5	
108 2986		5	
108 3018		5	
108 3019	108 3021	5	
108 3022		5	
108 3026		5	
108 3129		5	
108 3133	108 3134	5	
108 3136	108 3153	5	
110 0109	110 0112	5	
110 0135		5	
110 0200	110 0201	5	
110 0202	110 0203	5	
111 0265	111 0284	5	
111 0727;	111 0745	5	
111 0931		5	
111 1007	111 1016	5	
111 1384		5	
111 1429		5	
111 1608	111 1609	5	
111 2149	111 2151	5	
111 2308		5	
111 2559		5	
111 2584	111 2589	5	
111 2686		5	
111 2873	111 2883	5	
111 2884	111 2893	5	
111 2904	111 2921	5	
111 2904	111 2908	5	
111 2928	111 2935	5	
111 2945	1112947	5	
111 2968	111 2976	5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
111 2977		5	
111 2978		5	
111 2979		5	
111 2980		5	
111 2981		5	
111 2982		5	
111 2983		5	
111 2984		5	
111 2985		5	
111 2986		5	
111 2987		5	
111 2988	111 2989	5	
111 2990		5	
111 2991		5	
111 2992		5	
111 2993		5	
111 2994		5	
111 2995	111 2996	5	
111 2997	111 3000	5	
111 3001	111 3002	5	
111 3003	111 3012	5	
111 3050	111 3126	5	
111 3354	111 3362	5	
111 3370	111 3371	5	
111 3377	111 3382	5	
111 3383	111 3388	5	
111 3384	111 3388	5	
111 3389		5	
111 3402	111 3404	5	
111 3402	111 3403	5	
111 3405		5	
111 3406	111 3407	5	
111 3408	111 3437	5	
111 3410	111 3422	5	
111 3423	111 3431	5	
111 3498	111 3505	5	
111 3502	111 3505	5	
111 3514	111 3516	5	
111 3605	111 3617	5	
111 3618	111 3641	5	
111 4010		5	
114 0004	114 0006	5	
114 0010	114 0014	5	
114 0016		5	
114 0020		5	
114 1391	114 1395	5	
115 5346;	115 5373	5	
115 5371	115 5373	5	
115 5407		5	
115 5431		5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
115 5437		5	
115 5448		5	
115 5456		5	
115 5462		5	
115 5482		5	
115 5486		5	
115 5490		5	
115 5494		5	
117 1340	117 1344	5	
117 1346	117 1352	5	
117 1361	117 1367	5	
117 1380		5	
117 1383		5	
117 1388	117 1389	5	
117 1393	117 1396	5	
117 1407	117 1410	5	
117 1434	117 1450	5	
117 1915		5	
117 2088;	117 1915	5	
117 2123	117 2128	5	
117 2130	117 2147	5	
117 2176	117 2178	5	
117 2220	117 2225	5	
117 2228	117 2231	5	
117 2235	117 2236	5	
117 2243	117 2244	5	
117 2243	117 2244	5	
117 2249	117 2264	5	
118 0134	118 0149	5	
118 0166	118 0200	5	
118 0238	118 0271	5	
118 0286	118 0302	5	
118 0339	118 0357	5	
119 0022	119 0034	5	
119 0035	119 0056	5	
119 0153	119 0174	5	
119 1604		5	
120 3162;	120 3245	5	
120 3359		5	
121 1484	121 1486	5	
121 1487		5	
123 0131	123 0138	5	
124 0518;	124 0567	5	
126 0108	126 0111	5	
126 0116	126 0117	5	
128 0036	128 0057	5	
128 0040;	128 0056	5	
128 0058	128 0079	5	
128 0080	128 0101	5	
128 0729	128 0740	5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
128 0741	128 0756	5	
128 0782		5	
128 0783		5	
128 0794	128 0796	5	
128 0844		5	
128 0864		5	
128 0887	128 0888	5	
128 0889		5	
128 0892		5	
128 0894	128 0895	5	
128 0907		5	
128 0908	128 0912	5	
128 0913		5	
128 1048	128 1060	5	
128 1595		5	
128 1733		5	
128 1839	128 1840	5	
128 1847	128 1858	5	
128 1874	128 1880	5	
128 1874	128 1882	5	
128 1883		5	
128 1884	128 1889	5	
128 1884	128 1885	5	
128 1890		5	
128 1891		5	
128 1901	128 1904	5	
128 1909	128 1911	5	
128 1918		5	
128 1930	128 1958	5	
129 0001	129 0006	5	
129 0015	129 0035	5	
129 2333	129 2334	5	
129 2342	129 2343	5	
130 0677	130 0712	5	
130 0678;	130 0707	5	
130 0714;	130 0728	5	
130 0739	130 0764	5	
130 0818;	130 0831	5	
130 0853	130 0873	5	
130 0874	130 0894	5	
130 0895	130 0915	5	
130 0916	130 0936	5	
130 0937	130 0957	5	
130 0958	130 0975	5	
130 0977;	130 0992	5	
130 1052;	130 1064	5	
130 1074;	130 1086	5	
130 1275;	130 1307	5	
130 1350;	130 1372	5	
130 1376;	130 1398	5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
130 1402;	130 1426	5	
130 1433;	130 1463	5	
130 1467;	130 1493	5	
130 1670;	130 1690	5	
130 1672;	130 1676	5	
130 1692	130 1694	5	
130 1699;	130 1725	5	
130 1728;	130 1737	5	
130 1757;	130 1787	5	
130 1791;	130 1820	5	
130 2226	130 2230	5	
130 2226	130 2230	5	
130 2771	130 2776	5	
130 2771	130 2773	5	
130 2822;	130 2827	5	
130 2837	130 2837a	5	
130 2838	130 2839	5	
130 2840	130 2847	5	
130 2859	130 2864	5	
130 2865	130 2869	5	
130 2870	130 2878	5	
130 2879	130 2884	5	
130 2885	130 2890	5	
130 2891		5	
130 2892	130 2893	5	
130 2896	130 2902	5	
130 2903	130 2905	5	
130 3199	130 3203	5	
130 3246		5	
130 3357;	130 3370	5	
131 1226	131 1241	5	
134 1237	134 1239	5	
134 1818		5	
134 1828	134 1830	5	
134 1832		5	
134 1833		5	
134 1839	134 1853	5	
134 1869	134 1876	5	
134 1877	134 1883	5	
134 1888		5	
135 1713		5	
136 1107	136 1109	5	
136 1126	136 1130	5	
136 1148	136 1150	5	
136 1148	136 1150	5	
136 1349	136 1357	5	
136 2690	136 2693	5	
137 0605	137 0612	5	
137 0711	137 0716	5	
137 0997	137 0998	5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
137 1015	137 1040	5	
137 1101		5	
137 1102		5	
137 1707	137 1711	5	
137 1907		5	
137 1914		5	
137 1921		5	
137 1972		5	
137 2043	137 2044	5	
137 2130		5	
139 0085		5	
139 0419;	139 0430	5	
139 0424	139 0428	5	
139 0436;	139 0447	5	
139 0441	139 0443	5	
139 0453;	139 0464	5	
139 0458	139 0460	5	
139 0470	139 0481	5	
139 0475	139 0477	5	
139 0671;	139 0682	5	
139 0698;	139 0714	5	
139 0763	139 0765	5	
139 0767		5	
139 1517		5	
139 1536		5	
145 0582	145 0585	5	
147 0239	147 0241	5	
147 0333	147 0334	5	
147 0388	147 0392	5	
147 0757	147 0759	5	
147 1544	147 1547	5	
147 1544;	147 1546	5	
149 0437	149 0447	5	
149 0437;	149 0444	5	
149 0446	149 0447	5	
149 0448		5	
149 0471;	149 0478	5	
149 0504	149 0522	5	
149 0523	149 0536	5	
149 0577	149 0581	5	
149 0582;	149 0590	5	
149 1085		5	
149 1111	149 1113	5	
149 1126	149 1127	5	
149 1131	149 1132	5	
149 1133		5	
149 1136		5	
149 1137	149 1138	5	
149 1148	149 1149	5	
149 1150	149 1155	5	

Begin Bates	Ending Bates	RFI #	Information for Documents With No Bates # or Documents With Only Box and File Number
149 1157	149 1158	5	
149 1166		5	
149 1167	149 1168	5	
149 1169		5	
149 1170		5	
149 1195		5	
149 1196		5	
149 1199	149 1200	5	
149 1207		5	
149 1271	149 1275	5	
149 1276		5	
149 1277		5	
149 1279	149 1280	5	
149 1283	149 1284	5	
149 1286	149 1287	5	
149 1309		5	
149 1329		5	
149 1330		5	
149 1339		5	
149 1344		5	
149 1345	149 1346	5	
149 1347		5	
149 1348	149 1353	5	
149 1357	149 1365	5	
149 1370	149 1371	5	
149 1522	149 1523	5	
149 1527	149 1528	5	
149 1535	149 1536	5	
149 1615	149 1616	5	
149 1692	149 1697	5	
149 1821;	149 1940	5	
149 1841	149 1848	5	
149 1841	149 1847	5	
149 1852		5	
149 1853		5	
149 1853		5	
149 1855		5	
149 1893	149 1897	5	
149 2191	149 2197	5	
149 2308	149 2310	5	
149 2311	149 2312	5	
149 2444	149 2445	5	
155 1326;	155 1347	5	
159 0089		5	
162 1870		5	
164 0696		5	
164 1323	164 1445	5	
164 1539	164 1540	5	
164 1550	164 1552	5	
164 2174	164 2178	5	